

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

LOCAL 705 INTERNATIONAL BROTHER-	)	
HOOD OF TEAMSTERS HEALTH AND	)	
WELFARE FUND, <i>et al.</i> ,	)	
	)	CIVIL ACTION
Plaintiffs,	)	
	)	NO. 23 C 982
vs.	)	
	)	JUDGE ELAINE E. BUCKLO
ANDERSON BROS. STORAGE AND MOVING	)	
CO., an Illinois corporation,	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF DEFAULT AND JUDGMENT**

Plaintiffs, by their attorneys, and pursuant to Federal Rule of Civil Procedure Rule 55(b), move for entry of judgment by default against Defendant, ANDERSON BROS. STORAGE AND MOVING CO., an Illinois corporation, in the total amount of \$124,864.66, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,596.00.

On February 21, 2023, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to Mary McNulty, law firm receptionist) at its place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on March 15, 2023. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment pursuant to F.R.Civ.P. Rule 55(b).

/s/ Patrick N. Ryan

Patrick N. Ryan  
Attorney for Plaintiffs  
BAUM SIGMAN AUERBACH & NEUMAN, LTD.  
200 West Adams Street, Suite 1825  
Chicago, IL 60606-5250  
Bar No.: 6278364  
Telephone: (312) 216-2573  
Facsimile: (312) 236-0241  
E-Mail: [pryan@baumsigman.com](mailto:pryan@baumsigman.com)

I:\705w\Anderson Brothers\motion for default and judgment.pnr.df.wpd

**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participants on or before the hour of 5:00 p.m. this 29th day of March 2023:

D & L Company Agents, Inc., Registered Agent  
Anderson Bros. Storage and Moving, Co.  
216 Higgins Road  
Park Ridge, IL 60068-5706

Mr. Victor Rothstein, President  
Anderson Bros. Storage and Moving Co.  
2701 S. Western Avenue  
Chicago, IL 60608-5219

/s/ Patrick N. Ryan

Patrick N. Ryan  
Attorney for the Plaintiffs  
BAUM SIGMAN AUERBACH & NEUMAN, LTD.  
200 West Adams Street, Suite 1825  
Chicago, IL 60606-5250  
Bar No.: 6278364  
Telephone: (312) 216-2573  
Facsimile: (312) 236-0241  
E-Mail: [pryan@baumsigman.com](mailto:pryan@baumsigman.com)